

ENGINEERING MANAGEMENT SUPPORT INC.

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October 28, 2013

VIA: Electronic Mail

U.S. Environmental Protection Agency
Region VII SUPR/MOKS
11201 Renner Boulevard
Lenexa, KS 66219

ATTENTION: Mr. Dan Gravatt

SUBJECT: Revised Work Plan – Alternative Area 2 Excavation Depths and Volumes, West Lake Landfill Operable Unit 1, Bridgeton, Missouri

Dear Mr. Gravatt,

On behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc., and the United States Department of Energy (the “Respondents”), Engineering Management Support Inc. (EMSI) submits the attached revised Work Plan – Alternative Area 2 Excavation Depths and Volumes. The attached work plan has been revised to address comments provided by EPA’s National Remedy Review Board (NRRB) and by the Missouri Department of Natural Resources regarding the specific sections of the Supplemental Feasibility Study (SFS) report that may need to be revised to incorporate the results of the evaluations of the alternative depths and volume of radiologically-impacted material (RIM) in Area 2.

With regard to the comment that “...the 500,000 cubic yards amount corresponding to the ‘complete rad removal’ option likely overstates the volume and cost associated with a reasonable excavation remedy, especially where it appears feasible to separate out uncontaminated overburden material (e.g., construction debris),” we do not understand the basis or nature of the NRRB comment. The volume of RIM identified in Areas 1 and 2 for possible excavation under the “complete rad removal” is actually 335,500 bank cubic yards (bcy) (see Section 2.2.4 of the December 2011 SFS report). The SFS evaluations also identified 359,000 bcy of non-RIM overburden material (including both non-RIM solid waste and inert fill material) located over the RIM in Areas 1 and 2 that would need to be removed and segregated as part of any attempt to remove the underlying RIM.

The methods used to develop these volume estimates for both RIM and overburden were discussed with EPA during a webinar meeting prior to preparation of the SFS, and were subject to EPA review and approval during development of the draft and final SFS report. We do not understand the basis for the value of 500,000 cubic yards cited by the NRRB

or the apparent misunderstanding of the NRRB regarding the fact the prior SFS evaluations included separation of non-RIM overburden material from the volumes of RIM to be excavated and disposed elsewhere.

With respect to the comments provided by the NRRB regarding consistency of the evaluation of alternative Area 2 RIM depths and volume with comments and recommendations provided by the NRRB, we look to EPA Region VII to address these comments with the NRRB. The Work Plan previously provided to EPA and the attached revised Work Plan address EPA's request (as stated in EPA's October 12, 2012 letter to the Respondents) that the volume of RIM considered for possible excavation under the "complete rad removal" alternatives be revised to exclude deeper intervals in soil borings WL-210 and WL-235 in Area 2. With respect to consideration of other alternative volumes of RIM for examination of possible excavation, this activity is addressed in the separate Work Plan – Partial Excavation Alternative.

If you have any questions or desire additional information related to this work plan or any other aspect of the project, please do not hesitate to contact me.

Sincerely,
ENGINEERING MANAGEMENT SUPPORT, Inc.

A handwritten signature in black ink, appearing to read 'P. Rosasco', with a stylized flourish extending to the right.

Paul V. Rosasco, P.E.

Distribution:

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